

# **EXHIBIT B**

1 **UNITED STATES DISTRICT COURT**  
2 **SOUTHERN DISTRICT OF NEW YORK**

3 LYNNE FREEMAN, an individual,

4 *Plaintiff,*

5 -against-

Case No. 1:22-cv-02435-LLS

6 TRACY DEEBE-ELKENANEY  
7 P/K/A TRACY WOLFF, an individual,  
8 EMILY SYLVAN KIM, an individual,  
9 PROSPECT AGENCY, LLC, a New  
10 Jersey limited liability company,  
11 ENTANGLED PUBLISHING, LLC, a  
12 Delaware limited liability company,  
13 HOLTZBRINCK PUBLISHERS, LLC  
14 D/B/A MACMILLAN, a New York  
15 limited liability company, and  
16 UNIVERSAL CITY STUDIOS, LLC,  
17 a Delaware limited liability company,

18 *Defendants.*

19 **LYNNE FREEMAN'S**  
20 **NOTICE OF DEPOSITION OF PERSON MOST QUALIFIED FOR**  
21 **HOLTZBRINCK PUBLISHERS, LLC**  
22 **D/B/A MACMILLAN**

23 PLEASE TAKE NOTICE that, pursuant to Rules 26 and 30(b)(b) of the  
24 Federal Rules of Civil Procedure, Plaintiff Lynne Freeman, by her counsel, will  
25 take the deposition upon oral examination of the person most qualified to testify on  
26 behalf of Holtzbrinck Publishers, LLC, D/B/A Macmillan, with respect to the  
27 following topics:

- 28 1. Knowledge of the Distribution Agreement dated as of February 1,  
2013, between Entangled Publishing, LLC ("Entangled") and Holtzbrinck  
Publishers, LLC, d/b/a Macmillan ("Macmillan"), and any and all amendments  
thereto (collectively hereinafter referred to as the "Distribution Agreement").
2. Knowledge of all the ISBN numbers for the books Crave, Crush,  
Covet and Court (hereinafter collectively referred to as the "Crave Book Series").
3. Knowledge of the total number of sales of each of the books in the

1 Crave Book Series in any and all formats.

2 4. Knowledge of the total gross revenues received or accrued by  
3 Macmillan in connection with the exploitation of each of the books in the Crave  
4 Book Series.

5 5. Knowledge of any estimates or projections for future sales of each of  
6 the books in the Crave Book Series.

7 6. Knowledge of the total amount of money paid by Macmillan to  
8 Entangled, Tracy Deebbs-Elkenany p/k/a Tracy Wolff (“Wolff”), Emily Sylvan Kim  
9 (“Kim”), Liz Pelletier (“Pelletier”) or anyone else in connection with the  
10 exploitation of each of the books in the Crave Book Series.

11 7. Knowledge of the documents produced in this case by Macmillan.

12 8. Knowledge of the expenses incurred by Macmillan directly in  
13 connection with the writing or exploitation of each of the books in the Crave Book  
14 Series.

15 9. Knowledge of the development and writing of each of the books in the  
16 Crave Book Series

17 10. Knowledge of any indemnity relating to the lawsuit brought by Lynne  
18 Freeman against Universal and others relating to the lawsuit entitled Freeman v.  
19 Tracy Deebbs-Elkenaney et. al. (Case No. 22 Civ 2435 (LLS) (SN)).  
20

21 The deposition will begin on December 27 at 9:30 a.m. E.T., or at such time  
22 as may be agreed upon by counsel, continuing from day to day until completed or  
23 otherwise adjourned, at the offices of Reitler Kailas & Rosenblatt LLC, 885 Third  
24 Avenue, 20th Floor, New York, New York 10022. A duly authorized officer  
25 certified to administer oaths and take depositions will be present at the deposition.  
26 The deposition will be taken by stenographic and/or videographic means, and the  
27 deposition will be taken for the purpose of discovery, cross examination of an  
28 opposing party, preservation of testimony for trial, for use at trials or hearings, and

1 for all other purposes authorized by law.

2 PLEASE TAKE FURTHER NOTICE that the deposition may also be  
3 recorded by videotape and/or audiotape. If the deposition does not go forward on  
4 the date set forth above, the deposition will take place on a date mutually agreed to  
5 by counsel, with the same terms and requirements set forth herein applicable  
6 thereto.

7  
8 Dated: Los Angeles, CA

9 December 2, 2022

CSREEDER, PC

10 By: 

11 Mark D. Passin  
12 11766 Wilshire Blvd. Ste 1470  
13 Los Angeles, CA 90025  
14 Tel: (310) 861-2470  
15 Fax: (310) 861-2476  
16 Email: [mark@csrlawyers.com](mailto:mark@csrlawyers.com)

17 Reitler Kailas & Rosenblatt LLC  
18 Paul LiCalsi  
19 885 Third Avenue, 20th Floor  
20 New York, New York 10022  
21 Main: 212-209-3050  
22 Email: [plicalsi@reiterlaw.com](mailto:plicalsi@reiterlaw.com)

23 *Attorney for Defendant Lynne Freeman*

CSREEDER, PC  
ATTORNEYS AT LAW  
LOS ANGELES

[illegible]

On December 2, 2022, I served the foregoing document described as:  
**NOTICE OF DEPOSITION OF PERSON MOST QUALIFIED FOR  
HOLTZBRINCK PUBLISHERS, LLC D/B/A MACMILLAN** on the  
interested parties in this action as follows:

|  |  |
|--|--|
| <p>Nancy Wolff<br/> <a href="mailto:nwolff@cdas.com">nwolff@cdas.com</a><br/>         CeCe Cole<br/> <a href="mailto:ccole@cdas.com">ccole@cdas.com</a><br/>         Benjamin Halperin<br/> <a href="mailto:Halperin@cdas.com">Halperin@cdas.com</a><br/>         Cowan, DeBaets, Abrahams &amp;<br/>         Sheppard LLP</p> | <p><i>Attorneys for Defendants,</i><br/>         TRACY DEEBE-ELKENANEY P/K/A<br/>         TRACY WOLFF,<br/>         ENTANGLED PUBLISHING, LLC,<br/>         HOLTZBRINCK PUBLISHERS, LLC,<br/>         D/B/A/ MACMILLAN, UNIVERSAL<br/>         CITY STUDIOS, LLC</p> |
| <p>Dwayne Goetzel<br/> <a href="mailto:dgoetzel@intprop.com">dgoetzel@intprop.com</a><br/>         Kowert, Hood, Munyon, Rankin &amp;<br/>         Goetzel</p>   | <p><i>Attorneys for Defendants,</i><br/>         EMILY SYLVAN KIM,<br/>         PROSPECT AGENCY, LLC</p>   |
| <p>Lacy Herman Koonce, III<br/> <a href="mailto:lance.koonce@klarislaw.com">lance.koonce@klarislaw.com</a><br/>         Zachary M. Press<br/> <a href="mailto:zpress@klaris.com">zpress@klaris.com</a><br/>         Klaris Law</p>   |  |

1  
PROOF OF SERVICE

- 1 ☐ **BY FEDERAL EXPRESS - OVERNIGHT:** I caused such envelope to be  
2 deposited in a box or other facility regularly maintained by Federal Express  
3 in an envelope or package designated by Federal Express with delivery fees  
4 paid.
- 5 ☒ **BY ELECTRONIC MEANS:** I served a true copy of the document(s)  
6 described on all parties to this action by electronic mail to the email  
7 address(es) shown above.
- 8 ☐ **BY PERSONAL SERVICE:** I caused such envelope to be delivered by  
9 hand to the offices of the addressee(s).
- 10 ☒ (Federal) I declare that I am employed in the office of a member of the bar of  
11 this court at whose direction the service was made.

12 Executed on December 2, 2022, at Los Angeles, California.



13  
14 Mark D. Passin

1 **UNITED STATES DISTRICT COURT**  
2 **SOUTHERN DISTRICT OF NEW YORK**

3 LYNNE FREEMAN, an individual,

4 *Plaintiff,*

5 -against-

Case No. 1:22-cv-02435-LLS

6 TRACY DEEBS-ELKENANEY  
7 P/K/A TRACY WOLFF, an individual,  
8 EMILY SYLVAN KIM, an individual,  
9 PROSPECT AGENCY, LLC, a New  
10 Jersey limited liability company,  
11 ENTANGLED PUBLISHING, LLC, a  
12 Delaware limited liability company,  
13 HOLTZBRINCK PUBLISHERS, LLC  
14 D/B/A MACMILLAN, a New York  
15 limited liability company, and  
16 UNIVERSAL CITY STUDIOS, LLC,  
17 a Delaware limited liability company,

18 *Defendants.*

19 **LYNNE FREEMAN'S**  
20 **NOTICE OF DEPOSITION OF PERSON MOST QUALIFIED FOR**  
21 **UNIVERSAL CITY STUDIOS, LLC**

22 PLEASE TAKE NOTICE that, pursuant to Rules 26 and 30(b)(b) of the  
23 Federal Rules of Civil Procedure, Plaintiff Lynne Freeman, by her counsel, will  
24 take the deposition upon oral examination of the person most qualified to testify on  
25 behalf of Universal City Studios, LLC, with respect to the following topics:

- 26 1. Knowledge of the stage of the development of the motion picture  
27 entitled Crave ("Crave Motion Picture).
- 28 2. Knowledge of the budget for the Crave Motion Picture.
- 1 Knowledge of the Literary Option/Purchase Agreement dated as of  
February 7, 2020, between Entangled Publishing LLC ("Entangled") and Universal  
Pictures, a division of Universal City Studios LLC ("Universal"), and any and all  
amendments thereto (collectively hereinafter referred to as the "Option/Purchase  
Agreement.).
- 2 Knowledge of all payments made to Entangled, or anyone on its

1 behalf, pursuant to the Option/Purchase Agreement.

2 5. Knowledge of all payments made to anyone other than Entangled in  
3 connection with Universal's acquisition of the right to make the Crave Motion  
4 Picture.

5 6. Knowledge of any and all agreements entered into by Universal for the  
6 future exploitation of the Crave Motion Picture.

7 7. Knowledge of whether the Crave Motion Picture has been greenlit.

8 8. Knowledge of whether Universal intends to greenlight the Crave  
9 Motion Picture.

10 9. Knowledge of any money received by Universal in connection with  
11 the future exploitation of the Crave Motion Picture.

12 10. Knowledge of the cast of the Crave Motion Picture.

13 11. Knowledge of any indemnity relating to the lawsuit brought by Lynne  
14 Freeman against Universal and others relating to the lawsuit entitled Freeman v.  
15 Tracy Deebs-Elkenaney et. al. (Case No. 22 Civ 2435 (LLS) (SN).

16 12. Knowledge of all treatments and screenplays written for the Crave  
17 Motion Picture.

18 13. Knowledge of the development and writing of the book entitled Crave.

19 14. Knowledge of any other books written by Tracy Deebs-Elkenaney  
20 p/k/a Tracy Wolff the motion picture rights of which have been optioned or  
21 purchased by Universal.

22 15. Knowledge of the documents produced by Universal in this action.  
23

24 The deposition will begin on December 19 at 9:30 a.m. E.T., or at such time  
25 as may be agreed upon by counsel, continuing from day to day until completed or  
26 otherwise adjourned, at the offices of Reitler Kailas & Rosenblatt LLC, 885 Third  
27 Avenue, 20th Floor, New York, New York 10022. A duly authorized officer  
28 certified to administer oaths and take depositions will be present at the deposition.




1 The deposition will be taken by stenographic and/or videographic means, and the  
2 deposition will be taken for the purpose of discovery, cross examination of an  
3 opposing party, preservation of testimony for trial, for use at trials or hearings, and  
4 for all other purposes authorized by law.

5 PLEASE TAKE FURTHER NOTICE that the deposition may also be  
6 recorded by videotape and/or audiotape. If the deposition does not go forward on  
7 the date set forth above, the deposition will take place on a date mutually agreed to  
8 by counsel, with the same terms and requirements set forth herein applicable  
9 thereto.

10  
11 Dated: Los Angeles, CA  
12 December 2, 2022

CSREEDER, PC

13 By:   
14 Mark D. Passin  
15 11766 Wilshire Blvd. Ste 1470  
16 Los Angeles, CA 90025  
17 Tel: (310) 861-2470  
18 Fax: (310) 861-2476  
19 Email: [mark@csrlawyers.com](mailto:mark@csrlawyers.com)

20 Reitler Kailas & Rosenblatt LLC  
21 Paul LiCalsi  
22 885 Third Avenue, 20th Floor  
23 New York, New York 10022  
24 Main: 212-209-3050  
25 Email: [plicalsi@reiterlaw.com](mailto:plicalsi@reiterlaw.com)

26 *Attorney for Defendant Lynne Freeman*

[illegible]


On December 2, 2022, I served the foregoing document described as:  
**NOTICE OF DEPOSITION OF PERSON MOST QUALIFIED FOR**  
**UNIVERSAL CITY STUDIOS, LLC** on the interested parties in this action as  
 follows:

|  |  |
|--|--|
| <p>Nancy Wolff<br/> <a href="mailto:nwolff@cdas.com">nwolff@cdas.com</a><br/>         CeCe Cole<br/> <a href="mailto:ccole@cdas.com">ccole@cdas.com</a><br/>         Benjamin Halperin<br/> <a href="mailto:Halperin@cdas.com">Halperin@cdas.com</a><br/>         Cowan, DeBaets, Abrahams &amp;<br/>         Sheppard LLP</p> | <p><i>Attorneys for Defendants,</i><br/>         TRACY DEEBS-ELKENANEY P/K/A<br/>         TRACY WOLFF,<br/>         ENTANGLED PUBLISHING, LLC,<br/>         HOLTZBRINCK PUBLISHERS, LLC,<br/>         D/B/A/ MACMILLAN, UNIVERSAL<br/>         CITY STUDIOS, LLC</p> |
| <p>Dwayne Goetzel<br/> <a href="mailto:dgoetzel@intprop.com">dgoetzel@intprop.com</a><br/>         Kowert, Hood, Munyon, Rankin &amp;<br/>         Goetzel</p>   | <p><i>Attorneys for Defendants,</i><br/>         EMILY SYLVAN KIM,<br/>         PROSPECT AGENCY, LLC</p>   |
| <p>Lacy Herman Koonce, III<br/> <a href="mailto:lance.koonce@klarislaw.com">lance.koonce@klarislaw.com</a><br/>         Zachary M. Press<br/> <a href="mailto:zpress@klaris.com">zpress@klaris.com</a><br/>         Klaris Law</p>   |  |

**II BY MAIL:** By placing a true and correct copy of the above-described document(s) in envelope(s), addressed as set forth above, with first class postage pre-paid for delivery to the above-named persons at the above-listed addresses and depositing such envelopes in a US mail collection box.

- 1 ☐ **BY FEDERAL EXPRESS - OVERNIGHT:** I caused such envelope to be  
2 deposited in a box or other facility regularly maintained by Federal Express  
3 in an envelope or package designated by Federal Express with delivery fees  
4 paid.
- 5 ☒ **BY ELECTRONIC MEANS:** I served a true copy of the document(s)  
6 described on all parties to this action by electronic mail to the email  
7 address(es) shown above.
- 8 ☐ **BY PERSONAL SERVICE:** I caused such envelope to be delivered by  
9 hand to the offices of the addressee(s).
- 10 ☒ (Federal) I declare that I am employed in the office of a member of the bar of  
11 this court at whose direction the service was made.

12 Executed on December 2, 2022, at Los Angeles, California.

13   
14 \_\_\_\_\_  
15 Mark D. Passin  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28